

National Association of Charterboat Operators

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Black River Charter Guides Assn
Cape Canaveral Charter Captains Association
Cape Cod Charter Boat Assn
Cape May Charter Boat Assn
Captree Boatman Open & Charter Boats
Charterboat Assn. Of Puget Sound
Chicago Sportfishing Assn.
Deep Creek Charterboat Assn.
Destin Charterboat Assn
Eastern Lake Erie CharterBoat Assn.
Florida Guides Association Inc.
Greater Point Pleasant Charter Assn
Homer (AK) Charter Assn.
Ilwaco Charter Assn.
Juneau Charterboat Operators Assn.
Kenosha (WI) Charterboat Assn.
Key West Charterboatmen's Assn.
Lake Michigan Sportfishing Assn.
Ludington (MI) Area Charterboat Assn.
Marathon Guides Association
Marco Island Charter Captain's Assn.
Maryland Charterboat Assn
Maryland Charterboat Assn.
Michigan Charterboat Assn.
Michigan City Charterboat Assn.
Mississippi Charter Boat Captain's Assn.
Niagara County Charter Assn.
Nat'l Party Boat Association
North Coast (OH) Charter Boat Assn.
Northeast Charterboat Captains Assn.
Panama City Boatmen Assn
Pennsylvania Lake Erie Charter Captain Assn.
Petersburg (AK) Charterboat Assn.
Port Aransas (TX) Boatmen Inc.
Seaward Charterboat Assn.
Sitka (AK) Charter Boat Operators Assn.
Valdez Charterboat Assn.
United Boatmen
Upper Bay Charter Captains Association
Virginia Charter Boat Assn.
Waukegan (IL) Charterboat Assn.
Westport (WA) Charter Assn.

July 20, 2003

Docket Management Facility
(USCG-2003-14733) -9
U.S. Department of Transportation
Room PL-401
400 Seventh Street, S.W.
Washington, DC 20590-0001

Re: Comments on proposed rulemaking Department of Homeland Security, Coast Guard, 33 CFR Parts 103, (USCG-2003-14733), RIN 1625-AA42, Area Maritime Security, dated July 1, 2003.

Dear Sirs:

We respectfully request your serious consideration of our comments and concerns regarding the above. NACO represents over 3300 Charterboat owners and operators from Alaska to the Gulf of Mexico to Maine. NACO has maintained an excellent cooperative relationship with the USCG since our founding in 1991 and has worked well with them in development and implementation of various regulations and requirements that affect the charterboat industry. We are the leading voice in the United States representing charterboat owners and their operations. Here are our comments and concerns regarding the proposed rule.

You should be aware that after 9/11, NACO on behalf of the charterboat industry initiated a cooperative effort with the U.S. Coast Guard to better protect the maritime domain. As a result, we were able to form a cooperative Memorandum of Agreement with you that was signed in November 2002 by Rear Admiral Pluta and our Vice Chairman Ed O'Brien. This MOA is effective through December 31, 2006 and we expect to continue the MOA well into the future. The MOA lays the frame work for cooperation between charter vessels and the USCG in providing the opportunity for NACO to participate in local port security committees and calls for NACO members to immediately report any suspicious activity to the local OCMI or response center. As you can see, NACO has taken the lead for charterboats to assist the USCG and local enforcement personnel in protecting our country.


NACO represents and speaks on the behalf of small, mostly family owned and operated businesses. The vessels operated by these family businesses generally are in the size range of fifteen (15) to sixty five (65) feet. Some of our larger fishing vessels will be up to one hundred (100) feet. Charterboats are also less than 100 gross tons. The vessels will range in passenger capacity from the typical guide vessel carrying one (1) or two (2) passengers all the way up to the 100 foot vessel which may be U.S. Coast Guard certified for up to 150 passengers. With the exception of trailered guide boats, most all charter vessels will operate from and return to the same dock every day. Their route generally will not exceed more than 50 miles offshore with some operating in bays and estuaries and some extending as far as 100 miles offshore. We are in agreement with this particular interim rule. We do however, submit that in order for this rule to be effective, the Area Maritime Security (AMS) Committee must include the charterboat industry as members. NACO stands ready to serve on this committee and any other committee utilized to give advice regarding the charterboat industry and homeland security.

Any risk based assessment must have input from our industry in order to provide proper information and understand all possible impacts. This type of coordination is imperative to development of a workable plan.

Our knowledge of the charterboat industry and the local communities we serve is vast. We have identified over 16,000 for-hire fishing vessels operating in the United States. We have extensive research on the social and economic impacts of the charterboat industry. We can provide first hand knowledge about the charterboat industry and the social and economic impacts to the nation. Our participation is critical to the proper development of any security plan which shall consider risks versus benefits. Clearly, NACO, on behalf of the charterboat industry has demonstrated our proactive and willing desire to help prevent harmful attacks in the maritime domain.

We respectfully request a response to our comments and look forward to continued cooperation with the USCG. As always, our door is open and we look forward to discussions with you.

Thank you,


Captain Bob Zales, II
Chairman

Cc:file